

**McGuireWoods LLP**  
 1251 Avenue of the Americas  
 20<sup>th</sup> Floor  
 New York, NY 10020  
 Phone: 212.548.2100  
 Fax: 212.548.2150  
[www.mcguirewoods.com](http://www.mcguirewoods.com)

**Philip A. Goldstein**  
 Direct: 212.548.2167

**McGUIREWOODS**

[pagoldstein@mcguirewoods.com](mailto:pagoldstein@mcguirewoods.com)  
 Fax: 212.715.6275

April 6, 2020

**Via CM/ECF**

The Honorable Katherine Polk Failla  
 United States District Court  
 Southern District Of New York  
 Thurgood Marshall United States Courthouse  
 40 Foley Square  
 New York, NY 10007

**Re:** *Cara Nasisi et al. v. Comprehensive Health Management, Inc.*  
**Case No. 1:19-cv-4132-KPF**  
***Joint Request for Further Extension of Time***

Dear Judge Failla:

On November 18, 2019, the Court issued an Order on the parties' Agreed Motion to Conditionally Certify a Narrowed Class and Approve Notice to Potential Plaintiffs in the Collective. *See* Dkt. No. 73. In that Order, the Court ordered that the parties file a Supplemental Proposed Civil Case Management Plan and Scheduling Order within 120 days of entry of the order, i.e., by Monday, March 16th. On Friday, March 13<sup>th</sup>, this Court granted an extension of time to file the Supplemental Proposed Civil Case Management Plan and Scheduling Order through Monday, March 30<sup>th</sup> as the joint request of the parties. *See* Dkt. No. 96. On Friday, March 27<sup>th</sup>, this Court granted a further extension of time through April 6<sup>th</sup>, also at the parties' joint request. *See* Dkt. No. 98.

The parties have now reached an agreement to mediate this case and selected a private mediator. They intend to engage in informal discovery prior to mediation limited to payroll and timekeeping data and other information needed for evaluation of settlement value. The parties have not selected a mediation date but based on the need to exchange and review data prior to mediation and travel restrictions related to the COVID-19 public health crisis, they anticipate that mediation will occur in August or early September.

In order to minimize legal costs prior to mediation, the parties desire not to engage in discovery other than that necessary for settlement purposes, as outlined above. Accordingly, they jointly request that all formal discovery be stayed pending mediation and that the Court set a date

Hon. Katherine Polk Failla

April 6, 2020

Page 2

for submission of a joint status report and/ or a supplemental case management plan and scheduling order after completion of mediation.

No other scheduled dates will be impacted by the requested extension of time. The parties again appreciate the Court's consideration of this request.

Jointly and respectfully submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

*Counsel for Defendant*

/s/ Maureen A. Salas

Maureen A. Salas

*Counsel for Plaintiffs*

cc: All Counsel of Record via CM/ECF

Application GRANTED. This case is hereby STAYED. The Clerk of Court is directed to terminate all remaining deadlines in this case. The parties should provide a status update to the Court on or before **September 18, 2020**, with respect to the status of the mediation.

Date: New York, New York SO ORDERED.  
April 6, 2020



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE